

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

Curtis Neal, <i>on behalf of himself</i>)	
<i>and others similarly situated,</i>)	Civil Action No.: 3:17-cv-00022
)	
Plaintiff,)	
)	
v.)	
)	
Wal-Mart Stores, Inc., d/b/a Walmart and)	
Synchrony Bank, f/k/a GE Capital Retail)	
Bank,)	
)	
Defendants.)	
_____)	
)	
Roy Campbell <i>on behalf of himself</i>)	
<i>and all others similarly situated,</i>)	
)	
Plaintiff,)	
)	
v.)	
)	
Synchrony Bank,)	
)	
Defendant.)	

MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES, AND INCENTIVE AWARDS

After nearly four years of litigation and with the assistance of an experienced mediator, Curtis Neal and Roy Campbell ("Plaintiffs"), with their counsel, secured the resolution of this Telephone Consumer Protection Act ("TCPA") class action that will result in the creation of a non-reversionary, all-cash, \$2.9 million settlement fund for the benefit of consumers nationwide. For their hard work and dedication in achieving that impressive result, Plaintiffs respectfully request that this Court award attorneys' fees to their counsel in the amount of one-third of the

common fund, approve the reimbursement of litigation costs and expenses totaling \$20,525.39, and approve respective incentive awards to Plaintiffs in the amount of \$10,000 each.¹

For the reasons set forth in their accompanying memorandum of law and supporting declarations, Plaintiffs respectfully submit that these awards are reasonable, justified, and in line with awards approved in analogous class actions under the TCPA.

Moreover, to date, no class members have objected to these requests.

Dated: December 30, 2020

Respectfully submitted,

/s/ Aaron D. Radbil

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Counsel for Campbell and class counsel

¹ A proposed order granting this motion will be submitted in connection with Plaintiffs' forthcoming motion for final approval of the settlement, and will be in the form previously submitted to this Court as Exhibit 7 to ECF No. 115-3.

CERTIFICATE OF SERVICE

I certify that on December 30, 2020, the foregoing document was filed with the Court using CM/ECF, which will send notification of such to counsel of record.

/s/ Aaron D. Radbil
Aaron D. Radbil